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Transcript of J. Patrick Magill

Date: May 30, 2024

Case: Free Speech Systems, LLC -v- PQPR Holdings Lmted, LLC, et al.

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IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

IN RE: :
: CHAPTER 11
FREE SPEECH SYSTEMS, :
: Debtors. : CASE NO. 22-60043 (CML)
: :
FREE SPEECH SYSTEMS, LLC, :
: Plaintiff, :
: vs. : ADVERSARY NO. 23-03127
: :
PQPR HOLDINGS LIMITED, LLC, :
JLJR HOLDINGS, LLC, PLJR :
HOLDINGS, LLC, AEJ AUSTIN :
HOLDINGS, LLC, AEJ 2018 :
TRUST, CAROL JONES AND :
DAVID JONES, :
: Defendants. :
:

STENOGRAPHIC DEPOSITION OF J. PATRICK MAGILL

HOUSTON, TEXAS

THURSDAY, MAY 30, 2024

(Reported Remotely)

REPORTED BY: TANYA L. VERHOVEN-PAGE,
CCR-B-1790

FILE NO. 540158

Transcript of J. Patrick Magill
Conducted on May 30, 2024

2

1 May 30, 2024

2 12:00 p.m.

3

4 Stenographic deposition of
5 J. PATRICK MAGILL, held in Houston, Texas
6 before Tanya L. Verhoven-Page, Certified
7 Court Reporter (GA), Licensed Court
8 Reporter (TN) and Certified
9 Shorthand Reporter (TX).

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PQPR Exhibit 2

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I N D E X

WITNESS: J. PATRICK MAGILL

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1 EXHIBITS INDEX:

2 (None offered.)

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1 HOUSTON, TEXAS; THURSDAY, MAY 30, 2024

2 12:00 P.M.

3

4 P R O C E E D I N G S

5

6 THE TECHNICIAN: Thank you to
7 everyone for attending this proceeding
8 remotely, which we anticipate will run
9 smoothly.

10 Please remember to speak slowly and
11 do your best not to talk over one
12 another, and please be aware that we are
13 recording this proceeding for backup
14 purposes. Any off-the-record discussions
15 should be had away from the computer, and
16 please remember to mute your microphone
17 for those conversations.

18 Please have your video enabled to
19 help the reporter identify who is
20 speaking, and if you're unable to connect
21 with video and are connecting via phone,
22 please identify yourself each time before
23 speaking.

24 We will provide a complementary
25 unedited recording of this deposition

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1 with the purchase of a transcript, and I
2 apologize in advance for any
3 technical-related interruptions.

4 Thank you.

5

6 Thereupon --

7

J. PATRICK MAGILL,
8 called as a witness, having been first duly sworn,
9 was examined and testified as follows:

10

11

EXAMINATION

12 BY MR. LEMMON:

13 Q Thank you, Mr. Magill. Steve Lemmon
14 here. Thanks for being available today.

15 Mr. Magill, where are you currently
16 physically located?

17 A In Houston, Texas.

18 MS. CATMULL: Hey, Steve, I'm sorry
19 to interrupt, but it's kind of hard to
20 hear you a little bit.

21 I guess I'll turn up the volume.

22 THE COURT REPORTER: I agree.

23 No, I think his -- it's really --

24 maybe he needs to turn up his or -- or --

25 Brad, can you help us?

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1 MR. LEMMON: How is this?

2 THE COURT REPORTER: Same.

3 THE TECHNICIAN: Would you like to
4 go off the record while we fix this
5 issue?

6 MS. CATMULL: That's fine with me.

7 (Brief pause.)

8 BY MR. LEMMON:

9 Q Mr. Magill, so where are you currently
10 physically located?

11 A Houston, Texas.

12 Q Where in Houston, Texas.

13 A 3711 Pinemont.

14 Q Okay. And is that your office?

15 A That's the office that -- that Free
16 Speech uses in Houston.

17 Q Sorry. I'm choked up, too, apparently,
18 but I think it's allergies with me.

19 When you say the office that Free Speech
20 uses, is that the office that Mr. Shultz came from
21 when he gave his deposition the other day?

22 A It is.

23 Q Okay. Thank you. How long have you been
24 the -- well, describe your position with FSS?

25 A I'm the Chief Restructuring Officer.

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1 Q How long have you had that position?

2 A Since October 20, 2022.

3 Q Okay. And please just -- and you don't
4 have to go into incredible detail, but you give us
5 the overall description of your job as Chief
6 Restructuring Officer?

7 A Well, my job is to -- as the description
8 defines, to go into Free Speech to do what I can to
9 correct the operations of the business, to improve
10 the performance of the company and to generate cash
11 to pay the creditors.

12 Q On the accounting side, who reports to
13 you?

14 A Jeff Shultz.

15 Q Anyone else?

16 A Not directly.

17 Q Okay. And do you have access to the
18 books and records of Free Speech Systems?

19 A I do.

20 Q All right. I want to ask you about your
21 familiarity with -- of the dealings between Free
22 Speech System and PQPR.

23 Can you tell us what your level of
24 familiarity is?

25 A It's reasonably -- it's reasonably

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1 complete at the beginning from -- from October
2 forward.

3 Q And what is your knowledge of what the
4 books and records of Free Speech Systems show as far
5 as what's owed to PQPR?

6 A Right now we have -- we have a weekly
7 distribution to PQPR that is reflective of the
8 arrangements of a fee split going forward. So we
9 reconcile those accounts every single week and we
10 distribute money to PQPR on a weekly basis.

11 Q And do you deal with PQPR on an arm's
12 length basis?

13 A Currently, yes.

14 Q What is your knowledge of the amount of
15 the debt that is owed by Free Speech Systems to PQPR?

16 A My knowledge is pretty much what was
17 reflected in the Statement of Financial Affairs. So
18 that would be a legacy payable that was reflected on
19 the SOFA.

20 Q Have you done anything to investigate
21 that number to see if that's the correct number, the
22 number that's listed in the Statement of Financially
23 Affairs?

24 A Not really.

25 Q Why not?

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1 A Well, because, when we looked at the
2 records initially, we felt they were incomplete and
3 felt like we couldn't come to a conclusion.

4 So we were -- we -- we were relying on
5 the report from M3 to do the forensic accounting for
6 us. We are not forensic accountants. So we were
7 waiting for their reports.

8 Q So is it your testimony that the Debtor,
9 that being you or Mr. Shultz, have done nothing to
10 investigate independently what is owed by Free Speech
11 Systems to PQPR?

12 A Well, we've -- we initially requested
13 information. We received that information, but we
14 couldn't come to any conclusion.

15 Q You requested the information from who?

16 A From PQPR, Bob Rowe, yourself.

17 Q And you received information, didn't you?

18 A We did.

19 Q Did you personally review it?

20 A I did.

21 Q Did you come to any personal conclusions?

22 A I did not.

23 Q Why not?

24 A Again, we felt that the information that
25 was provided was inadequate for us to determine what

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1 we owed, if anything.

2 Q Did you go look at Free Speech Systems'
3 books for the -- for the corresponding entries to the
4 entries that were sent you from PQPR's books?

5 A The books and records of PQ- -- of Free
6 Speech prior to 7/29/2022 are, in my opinion,
7 unreliable. We --

8 Q Why -- are you saying you didn't even go
9 and look?

10 A No, I'm not saying that. We did go and
11 look, but we found them to be unreliable.

12 Q So did you -- when you got the PQPR data
13 that was sent you about the debt, you said you went
14 and you looked for the corresponding entries on FSS's
15 books. Did you find the corresponding entries?

16 A We found some entries specifically, but,
17 again, they were -- they were incomplete and,
18 therefore, not valuable enough for us to be able to
19 draw any kind of conclusion of what we owed PQPR.

20 Q When you say incomplete, are you saying
21 that not all of the corresponding entries existed on
22 Free Speech Systems' books?

23 A I'm saying that the information that we
24 reviewed that was available on -- from the Free
25 Speech side was in- -- was not conclusive enough for

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1 us to determine whether we owed money to PQPR.

2 Q Are you disputing that you owe any money,
3 or are you saying that you couldn't verify the total
4 number?

5 A Well, I'm -- unless I can confirm on our
6 end as to what we believe we owe, then I dispute
7 everything until I get information to the contrary.

8 Q Okay. I understand your position.

9 Now, describe the current transactions
10 between -- and I'm talking about under your -- under
11 your governance of the entity, describe the current
12 transactions between Free Speech Systems and PQPR?

13 A So currently Free Speech and PQPR have an
14 agreement. We -- Free Speech -- PQPR provides one
15 product currently for sale by Free Speech, and it's
16 Turbo Force. It is the only product that we
17 currently are using that comes from PQPR.

18 The arrangement is a revenue split. PQPR
19 provides Turbo Force. We sell Turbo Force on our --
20 on our programs and through our store, and then, at
21 the end of each week, we calculate what those sales
22 are. We take out agreed upon costs, really primarily
23 shipping, and the net amount of that is then split
24 50/50.

25 We report that weekly, and then we pay

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1 the 50 percent to PQPR, and we retain the 50 percent
2 for us.

3 Q And who owns the Turbo Force before it is
4 sold to the consumer?

5 A I believe PQPR owns it.

6 Q And prior to -- and how long has it been
7 the case that there was only one product, Turbo
8 Force?

9 A It's only been in the last two to three
10 months. We had other products that we sold. They
11 were not meaningful in the terms of sales, but we had
12 other products that we sold before in addition to
13 Turbo Force.

14 Q And has the basic way of selling the
15 product been the same with those other products as it
16 is -- as you described it to be with Turbo Force?

17 A I believe it was, yes.

18 Q And who pays the actual supplier of Turbo
19 Force?

20 A PQPR.

21 Q So PQPR orders the product from a
22 supplier, Free Speech Systems sells the product, Free
23 Speech Systems collects money from the consumer and
24 then splits the money on a predetermined basis with
25 PQPR, right?

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1 A That's correct.

2 Q And that's after deducting some costs for
3 handling or whatever, right?

4 A It's primarily -- it's almost
5 exclusively, you know, handling and shipping,
6 out-of-pocket cost, yes.

7 Q Thank you. Have you examined at all the
8 way that Free Speech Systems did business with PQPR
9 before the bankruptcy?

10 A No.

11 Q Okay. So you're not able to tell the
12 court how what you're doing is different, if at all,
13 from what happened before?

14 A Correct.

15 Q Have you ever seen the security agreement
16 that exists between Free Speech Systems and PQPR?

17 A No.

18 Q Are you aware that the original of that
19 security agreement is at Free Speech Systems, and I'm
20 supposed to pick it up later today?

21 A Yes.

22 Q Okay. And who -- what person at Free
23 Speech Systems found that security agreement
24 originally?

25 A Michelle Fruge.

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1 Q Who does Michelle Fruge report to?

2 A Jeff Shultz.

3 Q And what is Michelle Fruge's job
4 description?

5 A She's the head of HR, human resources,
6 and she's a staff accountant. Basically accounts
7 payable clerk.

8 Q Okay. So other than you, Mr. Shultz and
9 Michelle Fruge, who else works in accounting?

10 A We have a contract person that works for
11 us, Olivia. I -- I forgot her last name. She works
12 here at the office with Jeff Shultz. She --

13 Q How long has Olivia worked there?

14 A Maybe six months.

15 Q Has Michelle -- how long has Michelle
16 Fruge worked there?

17 A I believe she's been there something like
18 15 or 16 years at Free Speech.

19 Q And that's F-R-U-G-E, right?

20 A Correct.

21 Q Are you familiar with what her job was
22 before you got there?

23 A Michelle's?

24 Q Yes, sir.

25 A She was head of customer service?

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1 Q And what were her duties as head of
2 customer service.

3 A Well, she basically ran the department
4 that -- the department basically takes sale orders
5 from the store, processes those payments, then
6 communicates with the warehouse as to when the
7 shipments would be delivered.

8 So she's basically the front porch,
9 so-to-speak, of what the customers deal with on a
10 day-to-day basis in buying the supplements.

11 Q So what person at Free Speech Systems
12 could give us information regarding what Free Speech
13 Systems thinks it owes PQPR?

14 A No one that I'm aware of.

15 Q So the Debtor wants to use my client's
16 cash collateral through the 14th.

17 What do you want to use it for?

18 A Operating the business.

19 Q Towards what end?

20 A To maximize the amount of money that we
21 can make in this 14-period -- 14 days. We -- we do a
22 much better job in generating profits when we're
23 actually operating versus not operating.

24 Q And the Debtor intends to offer its
25 currently filed plan of reorganization for

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1 confirmation on the 14th; is that correct?

2 A I don't think we've made that decision.

3 Q So are you saying that the Debtor at this
4 point is not sure whether it's going forward with the
5 plan that's on file?

6 MS. CATMULL: Objection to the
7 extent he's asking -- to the extent you
8 need to share privileged confidential
9 communications with me to answer that
10 question, don't answer.

11 To the extent you can answer
12 without sharing that information, go
13 ahead.

14 THE WITNESS: I can't.

15 BY MR. LEMMON:

16 Q Well, I'm sorry. You said you cannot,
17 correct?

18 A I cannot.

19 Q What I'm getting to -- and I'm not trying
20 to be argumentative, but what I want to explore is
21 what the Debtor is doing between now and the 14th
22 because it is my client's contention that we might
23 all be better off if the Debtor ceased business
24 sooner rather than later, and those are the issues
25 that I want to explore now.

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1 Now, I'm not trying to invade the
2 attorney-client privilege Mr. Magill, and Ms. Catmull
3 is right to caution you, but what I want to know is
4 what are we going to tell the court about what's
5 going to happen with the use of our cash collateral
6 to benefit everybody and to protect my client's
7 interest, and so I know that that's a very broad way
8 of presenting that, but what I'm trying to say is,
9 if -- if we're going to get to a position where we're
10 going to have a dismissal of the case on the 14th, it
11 is our position that there is no need to have the
12 continued use of our cash collateral, and so,
13 Mr. Magill, what -- let me ask you: What do you say
14 in response to that contention from my client?

15 A Well, we have -- to the extent that I can
16 say this, we have made several proposals to the
17 plaintiffs to try to get a consensual plan with the
18 plaintiffs. We are hopeful, with the 14 days we have
19 remaining, that we can get there. It's my contention
20 that a consensual plan, a plan of reorganization,
21 benefits all creditors rather than a dismissal or a
22 liquidation.

23 So I'm going to work -- we're working as
24 hard as we can to get a response from them in terms
25 of what they are thinking and to the extent that

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1 Judge Lopez did acknowledge that if we could get an
2 agreement subject to papering up the deal then he
3 might give us a little more time.

4 So I'm trying to make -- I don't want to
5 close the book on a re-org, but clearly the
6 reorganization that we have on file is -- may or may
7 not be acceptable. It hasn't been, I guess,
8 acceptable to everybody. So I'm hoping that we can
9 get something done in the next 14 days. I hate to
10 give up on that. Because I do believe -- strongly
11 believe that a reorganization is a financial benefit
12 to everybody involved, and I'm going to pursue that.
13 So that's my answer.

14 Q And I hear you Mr. Magill, and I respect
15 that. Has the Debtor made any proposals to my
16 client?

17 A To PQPR?

18 Q Yes.

19 A Like in terms of the litigation?

20 Q Part of the reorganization or the
21 litigation?

22 A Not that I'm aware of.

23 Q So -- and I don't want to get into the
24 murkiness of all of the discussions that have taken
25 place, which is probably inappropriate, or it's

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1 arguably inappropriate. Let's put it that way, and
2 so -- but what I do want to -- and I hear exactly the
3 words you've said, but -- and I'm not trying to have
4 a debate here, but what I'm trying to figure out is
5 whether it's fair to say that the Debtor is just
6 trying to keep the ball in the air until the 14th to
7 see if something happens?

8 A Well, I'm not -- I guess that's generally
9 an acceptable response. I'm trying to keep our
10 options open to give us every opportunity we can to
11 try to get a deal done that benefits everyone.

12 So, I guess, that's a fair
13 characterization I believe.

14 Q So let's assume that there's not a plan
15 of reorganization that can be arrived at or agreed to
16 between now and the 14th, and, look, I, like a lot of
17 people, wish that there was, right, and everybody's
18 tried hard, and many people have tried hard. Let's
19 put it that way, and we've had a mediation and other
20 things. So I'm not going to get into that, but let
21 me -- what I want to explore is what are the Debtor's
22 exit plans in the event that a consensual
23 reorganization plan for FSS to continue as on an
24 ongoing entity.

25 Okay. Let's assume that that can't

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1 happen. For whatever reason, that just can't be
2 negotiated. Does the Debtor have plans -- do you
3 have plans for how the Debtor ceases operations?

4 MS. CATMULL: Yeah, I'll object
5 on -- to the extent you can answer
6 without revealing confidential
7 communications with me, go ahead. If you
8 cannot, then don't.

9 THE WITNESS: I don't think I can
10 answer that, Mr. Lemmon.

11 BY MR. LEMMON:

12 Q Have you -- have you personally -- I'm
13 not talking about -- you know, you're the chief
14 restructuring officer. So I'm not asking about what
15 you've done with your lawyer, but have you personally
16 sat down and charted out what a shutdown of the
17 company looks like and how mechanically it happens?

18 A No.

19 Q So you've been in this business a long
20 time, right, like I have, and we've seen all kinds of
21 shutdowns, right. We've seen leave the keys on the
22 table and walk out the door and call the bank and
23 tell them it's over, right, to -- on the one hand, to
24 an orderly process where assets are marshaled, key
25 employees are kept on for the purpose of maintaining

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1 those assets pending a sale, etcetera, okay.

2 So I know you well enough to know that
3 you should have and probably have given some thought
4 to how mechanically to achieve that, right?

5 A Well, to the extent that I would know how
6 long the judge would allow us to -- to continue, it's
7 my understanding -- let me give you a little context.
8 I think it would be helpful.

9 Q Sure.

10 A Assuming, for a minute, that Judge Lopez
11 is true to what he said in the hearing on the 21st,
12 if we don't have a plan -- I think a consensual plan
13 in place, there would be no conversion of the plan.
14 There would be a dismissal. It's kind of an either
15 or, as I understood that.

16 So in a dismissal, in my experience, it's
17 been -- it's much like a liquidation, but it's in
18 a -- but it's more like a seven. So if he gives
19 us -- let's say he decides June 14th we're going to
20 dismiss the case. We're going to have the effective
21 date a month out, six weeks out, whatever that sort
22 to be. That would be one plan. If he says you've
23 two weeks, that would be another plan. I'm not
24 certain that I can really pinpoint exactly how I
25 would liquidate because I don't know how much time I

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1 would have to do that as opposed to a liquidating
2 plan or even a conversion.

3 I mean, clearly what -- what would be
4 helpful would be to have as much time as we could to
5 get the most value we can for the assets, the assets
6 being the inventory.

7 So it's a little bit of an open issue,
8 which is why I haven't been able to really
9 crystallize exactly what I would be able to do
10 because I don't know how much time I would have to do
11 it.

12 Q Do you have any plans to sit down between
13 now and the 14th with the constituents to try to
14 agree on -- what I'll call -- the soft landing would
15 look like?

16 A Would you define constituents?

17 Q Well, let's start with the secured
18 creditor, and let's move on from there, right.

19 A It is my plan to have meetings over the
20 next two weeks with, I guess, what we would call all
21 interested parties, and we're going to begin one -- I
22 have a standard meeting every week with the Alex --
23 what we call affectionately the Team Alex, and so we
24 will begin that process at 3:00 today.

25 So, yes, as we go through the process to

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1 figure out what the likelihood of a dismissal is, we
2 have to come up with certain plans accordingly.

3 So, yes, I'll be discussing it with
4 all -- as you call, all constituents over the next
5 two weeks.

6 MS. CATMULL: Hey, Steve, before
7 the next question, I want to ask you:
8 Did we copy you on a proposed dismissal
9 order?

10 MR. LEMMON: I've gotten a couple
11 versions of that, but, you know, I
12 don't -- that's not a dismissal order in
13 my opinion. That's a liquidation.

14 MS. CATMULL: No, no. That's fine.
15 I just wanted to make sure you didn't get
16 left out of the loop.

17 MR. LEMMON: But, again, you know,
18 it's our request to sit down and talk,
19 but that's -- we'll talk about that
20 later.

21 MS. CATMULL: Yeah. Yeah.

22 BY MR. LEMMON:

23 Q What adequate protection are you offering
24 my client, Mr. Magill, for the next two weeks?

25 A Nothing.

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1 MR. LEMMON: Thank you. That's all
2 I have.

3 MS. CATMULL: Great. I'm just
4 going to ask one question.

5 EXAMINATION

6 BY MS. CATMULL:

7 Q Mr. Magill, do you think PQPR needs
8 adequate protection in addition to what they have
9 already?

10 A No.

11 MS. CATMULL: I pass the witness.

12 MR. LEMMON: Thank you. That's it
13 for today.

14 MS. CATMULL: Thank you.

15
16 (Thereupon, the deposition was
17 concluded at approximately 12:28 p.m.)
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1

ERRATA SHEET FOR THE TRANSCRIPT OF:

2

Case Name:

Free Speech v. PQPR Holdings

3

Dep. Date:

May 30, 2024

4

Deponent:

J. PATRICK MAGILL

5

CORRECTIONS

6

Pg.

Ln.

Now Reads

Should Read

Reason

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Pg.

Ln.

Now Reads

Should Read

Reason

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Pg.

Ln.

Now Reads

Should Read

Reason

11

12

Pg.

Ln.

Now Reads

Should Read

Reason

13

14

Pg.

Ln.

Now Reads

Should Read

Reason

15

16

Pg.

Ln.

Now Reads

Should Read

Reason

17

18

Pg.

Ln.

Now Reads

Should Read

Reason

19

20

Pg.

Ln.

Now Reads

Should Read

Reason

21

22

Pg.

Ln.

Now Reads

Should Read

Reason

23

24

Pg.

Ln.

Now Reads

Should Read

Reason

25

Transcript of J. Patrick Magill
Conducted on May 30, 2024

29

1 I, J. PATRICK MAGILL, have read the
2 foregoing deposition and hereby affix my signature
3 that same is true and correct, except as noted above.

4

5

J. PATRICK MAGILL

6

7 THE STATE OF _____)

8 COUNTY OF _____)

9

10 Before me, _____, on
11 this day personally appeared J. PATRICK MAGILL, known
12 to me (or proved to me under oath or
13 through _____) (description of
14 identity card or other document)) to be the person
15 whose name is subscribed to the foregoing instrument
16 and acknowledged to me that they executed the same
17 for the purposes and consideration therein expressed.

18 Given under my hand and seal of office this
19 _____ day of _____, _____.

20

21

22

NOTARY PUBLIC IN AND FOR
THE STATE OF _____

23

24

25 COMMISSION EXPIRES: _____

Transcript of J. Patrick Magill
Conducted on May 30, 2024

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1 given by the witness;

2 That the deposition transcript was
3 submitted on May 31st, 2024 to the witness or to the
4 attorney for the witness for examination, signature,
5 and return to me by _____;

6 That the amount of examination time used by
7 each party at the deposition is as follows:

8 BY MR. LEMMON: 00:26:27

9 BY MS. CATMULL: 00:00:15

10 BY MS. FREEMAN: 00:00:00

11 BY MR. NEGLESS: 00:00:00

12 That pursuant to information given to the
13 deposition officer at the time said testimony was
14 taken, the following includes counsel for all parties
15 of record:

16 ON BEHALF OF THE PLAINTIFF AND DEBTORS:

17 O'CONNOR WECHSLER, PLLC
18 4400 Post Oak Parkway
19 Suite 2360
20 Houston, Texas 77027
21 ANNIE CATMULL, ESQ.

22 ON BEHALF OF THE DEFENDANTS:

23 STREUSAND, LANDON, OZBURN & LEMMON, LLP
24 1801 S. MoPac Expressway
25 Suite 320
Austin, Texas 78746
STEPHEN W. LEMMON, ESQ.

Transcript of J. Patrick Magill
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1 ON BEHALF OF THE SUBCHAPTER 5 TRUSTEE:

2 THE LAW OFFICE OF LIZ FREEMAN
3 700 Smith Street
4 Houston, Texas 77208-1209
LIZ FREEMAN, ESQ.

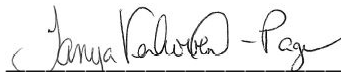
5 ON BEHALF OF THE CONNECTICUT PLAINTIFFS:

6 PAUL, WEISS, RIFKIND,
7 WHARTON & GARRISON, LLP
8 1285 Avenue of the Americas
New York, New York 10019-6064
DANIEL NEGLESS, ESQ.

9
10 I further certify that I am neither counsel
11 for, related to, nor employed by any of the parties
12 or attorneys in the action in which this proceeding
13 was taken, and further that I am not financially or
14 otherwise interested in the outcome of the action.

15 Further certification requirements pursuant
16 to Rule 203 of TRCP will be certified to after they
17 have occurred.

18 Certified to by me this day, the 31st day
19 of May, 2024.

20
21 

22 Tanya L. Verhoven-Page
23 Texas CSR No. 12254, Exp. 12/24
PLANET DEPOS, LLC
24 Texas Court Reporting Firm Reg. #686
451 Hungerford Drive, Suite 400
Rockville, Maryland 20850
25 (T) 1.888.433.3767 | (F) 1.888.503.3767
(E) transcripts@planetdepos.com

Transcript of J. Patrick Magill
Conducted on May 30, 2024

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1 FURTHER CERTIFICATION UNDER RULE 203, TRCP

2 The original deposition/errata sheet was / was
3 not returned to the deposition officer on
4 _____;

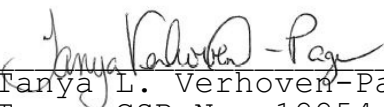
5 If returned, the attached Changes and Signature
6 page contains any changes and the reasons therefor;

7 If returned, the original deposition was
8 delivered to Custodial Attorney;

9 That \$_____ is the deposition officer's
10 charges to the Plaintiff for preparing the original
11 deposition transcript and copies of exhibits, if any;

12 That the deposition was delivered in accordance
13 with Rule 203.3, and that a copy of this certificate
14 was served on all parties shown herein on
15 _____ and filed with the Clerk.

16 Certified to by me on May 31, 2024.

17
18
19
20 
21 Tanya L. Verhoven-Page
22 Texas CSR No. 12254, Exp. 12/24
23 PLANET DEPOS, LLC
24 Texas Court Reporting Firm Reg. #686
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